



May 20, 2022

***Via Email/Portal***

Bureau of Case Inventory & Initial Notice  
Site Remediation Program  
New Jersey Department of Environmental Protection  
401-05H  
PO Box 420  
Trenton, NJ 08625-0420

**Re: Remedial Action Permit (RAP) Initial Application Forms (Soil & Groundwater)  
AOC 19: QC Lab & AOC 90: Former Drum Compound  
Hess Corporation Former Port Reading Complex (HC-PR)  
835 West Avenue  
Block: 664.01 Lot: 1.01  
Port Reading, Middlesex County, New Jersey  
Program Interest No. 006148  
NJDEP ISRA Case No. E20130449**

Dear Sir/Madam,

Earth Systems, Inc, on behalf of Hess Corporation (Hess), is submitting a revised Remedial Action Permit (RAP) Initial Application Form – Groundwater and a revised RAP Initial Application Form - Soil for the above referenced facility (Site). These forms have been revised as per comments provided by the New Jersey Department of Environmental Protection (NJDEP) Traditional Oversight Case Team in an e-mail dated March 8, 2022. Please see below to see how the comments were addressed:

- Soil RAP Application – all references to a Beneficial Use Determination (BUD) have been removed
- GW RAP Application
  - Revised Section K to identify that a technical variance of NJAC 7:26E-4.3(a)4 is required.
  - Item G-1 has been revised to reflect that horizontal delineation has been completed and is acceptable.

- Specified compounds (aluminum, iron, manganese, and chloride) have been removed from the GW RAP form and CEA (see below)
- GW CEA
  - Specified compounds (aluminum, iron, manganese, and chloride) have been removed from Item 2 on the CEA Fact Sheet
  - 2021 Groundwater Contour Map has been included as Exhibit B-3
  - 2021 Groundwater data has been included in the exhibits
  - See Exhibit D regarding narrative description of plume extents. A note has been added to Exhibit D stating the following; “Biodegradation is not expected to be significant to natural attenuation based on site pH that is identified as related to concrete reuse. Any plume projections do not specifically incorporate biological processes and are based on actual groundwater data.” Section B, Item 4 has been revised and the projected term of the CEA is listed as indeterminate.

Please note that the RAP fees were previously submitted on September 1, 2021. A check was provided for the RAP Soil fee (\$1,760.00) and RAP Groundwater fee (\$990.00). These fees are still the correct amount according to the current RAP forms.

If you have any questions or comments relating to this document, please contact me at (732) 739-6444. I can also be reached via email at [ablake@earthsys.net](mailto:ablake@earthsys.net).

Sincerely,

Earth Systems, Inc.



Amy Blake  
Sr. Project Manager

Cc: Ms. Julia Galayda, NJDEP (electronic copy)  
Mr. John Virgie, Earth Systems (electronic copy)  
Mr. John Schenkewitz, Hess Corporation (electronic copy)  
Mr. Rick Ofsanko, Earth Systems, Inc. (electronic copy)